

From: Dan Connally
To: ["Poentis, Kris T"](#)
Cc: [Lum, Darryl C](#)
Subject: Kailua WWTP_HI_7-25-2013_Admin Draft Permit
Date: Thursday, July 25, 2013 1:50:00 PM
Attachments: [Kailua WWTP_HI_7-25-2013_Admin Draft Permit.doc](#)

Hey Kris, attached is a revised Kailua (all changes in tracked changes). I've attempted to address all of the Discharger's comments, as well as add a compliance schedule and revise the nutrients. There are a couple issues I need some feedback from you on before I can do some final edits:

- 1) They are requesting that mass-based limits be based on a design flow of 15.25 MGD (specifically for BOD, TSS, chlordane and dieldrin). The previous permit based them on 12.7 MGD for BOD and TSS. I can't grant them an increase for those two parameters due to anti-deg (unless they submit an anti-deg study). I could grant them mass-based limits for other parameters based on 15.25 MGD, what do you think about that? This change would take about 5 minutes for me.
- 2) The requested that I include a table of the existing nearshore monitoring station locations (lat and longs). We did this for offshore stations, but didn't for the nearshore because they're current stations are not within 300 meters (which was required). The current permit requires them to establish stations within 300 meters for nearshore monitoring. They claim they can't due to hazardous conditions, but do not provide any additional information on the "hazardous conditions". I would recommend we ask them to provide documentation describing these conditions. Adding the table would only take about 5 minutes if you decide we should do this.
- 3) The state the would like to include provisions in the permit to allow outside generated sludge to be discharged DOWNSTREAM of the treatment plant's influent sampler so it can be treated directly by the plant's solids handling facility. I'm not sure why they want to go downstream of the influent sampler, I have to give this some more thought. Not sure how this impacts regs. You might want to discuss internally with DOH staff as well. Adding this provision would only take a few minutes if you decide we should do this.
- 4) The included a comment that states, "Disposal at MSW Landfill should only require the Paint Filter Liquids Test, not groundwater monitoring or certification regarding aquifer contamination." This statement is in regards to DOH's standard biosolids requirements. I assume the tests are for the protection of groundwater. Please advise how you would like to be proceed with this. This change, if deemed appropriate, would only take a minute.
- 5) After all their comments, I'm unclear on exactly who the Director is, it appears to be Lori M.K. Kahikina. Can you please confirm? Once confirmed I will update the Director in the draft. They have requested that the Director, Deputy Director, and Second Deputy Director be authorized to sign reports. This is ok, but they did not provide the names of these individuals. They should provide written authorization, including their names.

If you'd like to discuss any of these, please feel free to give me a call. I will be providing the fact sheet immediately following this email. I will be switching over to finish up Honolulu at this point, and incorporated all these same edits.

Thank you,

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